

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

| | | |
|---------------------------|---|--------------------------|
| Associated Recovery, LLC, |) | |
| |) | |
| Plaintiff, |) | |
| |) | No. 1:15-cv-1723-AJT-JFA |
| v. |) | |
| |) | |
| John Does 1-44, |) | |
| |) | |
| Defendants. |) | |
| |) | |

In re:

| | | | |
|--------------|-----------|---------|-----------|
| 744.COM | LMN.COM | VGJ.COM | YQT.COM |
| 028.COM | LUOHE.COM | WYD.COM | YRN.COM |
| 3DCAMERA.COM | MEQ.COM | XAQ.COM | YTE.COM |
| FNY.COM | OCU.COM | XFF.COM | YYG.COM |
| FX2.COM | PIXIE.COM | XSG.COM | ZDP.COM |
| FXF.COM | QMH.COM | YCX.COM | ZHD.COM |
| JTZ.COM | RUTEN.COM | YEY.COM | ZULIN.COM |
| KGJ.COM | SDU.COM | YGX.COM | ZZM.COM |
| KMQ.COM | SQG.COM | YJR.COM | |
| KOU.COM | TAOLV.COM | YJX.COM | |
| KXQ.COM | UHW.COM | YLZ.COM | |
| KXW.COM | VCZ.COM | YQP.COM | |

**PLAINTIFF'S RESPONSE TO MOTION TO SET ASIDE
DEFAULT JUDGMENTS REGARDING VGJ.COM AND YJX.COM
AND RETURN THOSE DOMAIN NAMES TO THEIR PRIOR OWNERS**

The Plaintiff Associated Recovery, LLC (the “Plaintiff” or “Associated Recovery”), by counsel, hereby submits this response to Defendants’ Motion to Set Aside Default Judgments Regarding VGJ.com and YJX.com and Return Those Domain Names to Their Prior Owners (“VGJ and YJX’s Motion to Set Aside Judgment”). ECF Nos. 61 and 62.

The Plaintiff acknowledges this Court’s recent decisions on other motions to set aside default judgments and the transfer of those previously “defaulted” defendants to the Northern District of Texas, Case No. 3:16-cv-1025-L. As the Plaintiff’s counsel previously discussed with counsel for VGJ and YJX, the Plaintiff largely does not object to the setting aside of the default judgment and transfer of the matter to the Northern District of Texas. However, the Plaintiff *does* object to the transfer of the domain names VGJ.com and YJX.com to the their alleged “prior owners.”

The Plaintiff agrees that it will not sell or otherwise transfer VGJ.com until a final resolution is reached in this matter. In regard to YJX.com, the Plaintiff’s counsel has recently learned that the domain name was sold. Therefore, if the Court grants VGJ and YJX’s Motion to Set Aside Judgment as to YJX.com, the Plaintiff requests that YJX be required to reimburse the Plaintiff for the costs necessary to return the buyer’s monies for the sale as well as to cover commissions and other costs that were spent to effect the sale.¹ The Plaintiff notes that the need for this compensation would not have been necessary if YJX had appeared in a timely fashion.

Finally, the Plaintiff submits that a hearing on this matter is unlikely to lead to any further assistance to the Court and therefore requests that the hearing on this motion be waived.

¹ The Plaintiff will provide this figure to YJX’s counsel upon the Court’s granting of the Plaintiff’s request.

As noted above, the Plaintiff is not objecting the setting aside of the default judgments against VGJ or YJX, or their transfer to the case pending in the Northern District of Texas. The Plaintiff only raises an objection to the transfer of the domain names back to VGJ and YJX and requests reimbursement from YJX.com for the purchase price, commission and other expenses paid in the sale of the domain name YJX.com. Moreover, the Plaintiff agrees that it will maintain the *status quo* and not sell or transfer the domain names VGJ.com or YJX.com.

Date: July 29, 2016

Respectfully,

/s/

Rebecca J. Stempien Coyle (VSB# 71483)
Counsel for the Plaintiff

Associated Recovery, LLC

LEVY & GRANDINETTI

1120 Connecticut Avenue, N.W., Suite 304
Washington, D.C. 20036

Telephone (202) 429-4560

Facsimile (202) 429-4564

mail@levygrandinetti.com

CERTIFICATE OF SERVICE

I, Rebecca J. Stempien Coyle, certify that on July 29, 2016, I electronically filed the foregoing PLAINTIFF'S RESPONSE TO MOTION TO SET ASIDE DEFAULT JUDGMENTS REGARDING VGJ.COM AND YJX.COM AND RETURN THOSE DOMAIN NAMES TO THEIR PRIOR OWNERS by using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Lora Brzezynski
Claire M. Maddox
Eric Wu
DENTONS US LLP
1900 K Street, N.W.
Washington, D.C. 20006
lora.brzezynski@dentons.com
claire.maddox@dentons.com
eric.wu@dentons.com

Steven M. Geiszler
Zunxuan D. Chen
DENTONS US LLP
2000 McKinney Avenue
Suite 1900
Dallas, TX 75201-1858
steven.geiszler@dentons.com
digger.chen@dentons.com

_____/s/
Rebecca J. Stempien Coyle
(VSB# 71483)
Counsel for the Plaintiff
Associated Recovery, LLC
LEVY & GRANDINETTI
1120 Connecticut Avenue, N.W.
Suite 304
Washington, D.C. 20036
Telephone (202) 429-4560
Facsimile (202) 429-4564
mail@levygrandinetti.com